

**UNITED STATES BANKRUPTCY COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	Bernardo Mikesell	:	Chapter 13
	Flordeliza Mikesell	:	
	<u>Debtors</u>	:	
Onslow Bay Financial LLC		:	
Movant		:	Bankruptcy Case Number
		:	19-14891 MDC
		:	
v.		:	
		:	
Bernardo Mikesell		:	
Flordeliza Mikesell		:	
Respondents/Debtors		:	
		:	
And		:	
		:	
Kenneth E West, Esquire		:	
Trustee		:	

**Debtors' Response to the Motion of Onslow Bay Financial LLC
for Relief from the Automatic Stay**

Debtors, **Bernardo and Flordeliza Mikesell**, by and through their counsel, **MICHAEL SCHWARTZ, ESQUIRE**, hereby file this response to the Motion for Relief of Onslow Bay Financial LLC and in support thereof avers as follows:

1. ADMITTED.
2. ADMITTED.
3. ADMITTED.
4. ADMITTED.
5. ADMITTED.
6. ADMITTED.
7. ADMITTED.

8. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

9. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant. By way of further response, payments have been made that were not accounted for in Movant's motion.

10. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant. By way of further response, payments have been made that were not accounted for in Movant's motion. Debtors intend to cure any post-petition arrears prior to the scheduled hearing date.

11. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant. By way of further response, payments have been made that were not accounted for in Movant's motion.

12. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant. By way of further response, Schedule A lists the market value at \$415,000.

13. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

14. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant. By way of further response, payments have been made that were not accounted for in Movant's motion. Debtors intend to cure the post-petition arrearage prior to the scheduled hearing.

15. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

16. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

WHEREFORE, Debtors, **Bernardo and Flordeliza Mikesell**, request this Honorable Court deny the motion of Onslow Bay Financial LLC for relief from automatic stay and to declare the automatic stay is still in effect.

Respectfully Submitted,

\s\ Michael Schwartz
MICHAEL SCHWARTZ, ESQUIRE
Attorney for Debtors